

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MATTHEW RALSTON,	:	
	Plaintiff,	CIVIL ACTION
v.	:	
	:	
MITCHELL GARABEDIAN, ESQUIRE, et al,	:	
	:	NO. 2:19-cv-01539
Defendants.	:	

**MOTION BY THE GARABEDIAN DEFENDANTS TO COMPEL ZACHARY LEHMAN
TO APPEAR FOR THE COMPLETION OF HIS DEPOSITION, TO ANSWER THE
QUESTIONS HE PREVIOUSLY REFUSED TO ANSWER AND TO APPEAR FOR THE
DESIGNEE DEPOSITION**

Defendants, Mitchell Garabedian, Esquire and Mitchell Garabedian, Esquire d/b/a Law Offices of Mitchell Garabedian (“Garabedian”), move to compel Lehman to appear for the completion of his deposition, to answer the questions he previously refused to answer at pages 17-18, 76-81, 84-86, 91-93, 96-102, 113-114 of his deposition, and to appear for the designee deposition. Garabedian will rely on the accompanying memorandum of law and exhibits.

Respectfully submitted,

/s/ Candidus K. Dougherty

Jeffrey B. McCarron
Candidus K. Dougherty
SWARTZ CAMPBELL LLC

Dated: October 13, 2021